

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CONSERVATION LAW FOUNDATION,
INC.

Plaintiff,

v.

TRANSDEV NORTH AMERICA, INC., *and*
TRANSDEV SERVICES, INC.,

Defendants.

Case No. 1:19-cv-11503-LTS

JOINT MOTION TO LODGE CONSENT DECREE

Plaintiff Conservation Law Foundation (“CLF” or “Plaintiff”) and Defendants Transdev North America, Inc. and Transdev Services, Inc. (collectively “Defendants”) respectfully move to lodge the attached Consent Decree with the Court for later entry in accordance with the following paragraph of this joint motion. The Consent Decree represents a settlement of all claims presented by Plaintiff against Defendants in this case. The parties represent that the settlement terms are appropriate, reasonable, and in the public interest.

Under Section 304(c)(3) of the Clean Air Act, the United States has 45 days from receipt of a proposed consent judgment by the Department of Justice Citizen Suit Coordinator (on behalf of the Attorney General) and the U.S. Environmental Protection Agency to review the proposed consent judgment and provide any comments to the Court. 42 U.S.C. § 7604(c)(3). Plaintiff will promptly provide a copy of the proposed consent judgment to the United States by email and overnight mail. The parties will then notify the Court when the 45-day period has expired, and request at that time that the proposed consent decree be entered.

October 26, 2020

Respectfully submitted,

CONSERVATION LAW FOUNDATION,
INC.

By its attorney:

/s/ Heather A. Govern

Heather A. Govern, Esq., BBO# 688482

Conservation Law Foundation

62 Summer Street

Boston, MA 02110

(617) 350-0990

hgovern@clf.org

TRANSDEV NORTH AMERICA, INC.,
TRANSDEV SERVICES, INC.

By its Attorney,

/s/ Brook Detterman

Brook Detterman, BBO No. 675396

BEVERIDGE & DIAMOND, P.C.

151 Federal Street, Suite 1600

Boston, MA 02110

(617) 419-2345

bdetterman@bdlaw.com

CERTIFICATE PURSUANT TO LOCAL RULE 7.1(a)(2)

I, as counsel for Plaintiff, hereby certify that I have conferred with counsel for all defendants on this motion and that defendants' counsel assented to and supports this motion, which is filed at the request of all parties.

/s/ Heather A. Govern

Heather A. Govern